

EXHIBIT 11

UNITED STATES SOUTHERN DISTRICT
SOUTHERN DISTRICT OF NEW YORK

-----x
GRAHAM CHASE ROBINSON,

Plaintiff,

-against-

Case No:
1:19-cv-09156 (LTS) (KHP)

ROBERT DE NIRO and CANAL PRODUCTIONS, INC.,

Defendants.

-----x
DEPOSITION TAKEN VIA ZOOM

March 30, 2022
9:32 a.m.

VIDEOTAPED DEPOSITION of TIFFANY CHEN, held at
the above-mentioned time, before, PAIGE HAYDEN, a Court
Reporter and Notary Public of the State of New York.
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1 T. CHEN

2 A. Uh-huh. Yes.

3 Q. If you look at the first
4 text message from 1:53 a.m., you
5 write, "I was thinking about Chase's
6 e-mail. She says she is just trying
7 to do her job. Nobody is stopping
8 her but herself."

9 A. Yes.

10 Q. What did you understand Ms.
11 Robinson's job to be?

12 A. Bob's assistant.

13 Q. And what was the scope of
14 Ms. Robinson's job responsibilities
15 as Mr. De Niro's assistant?

16 A. I can't answer that
17 question. She is Mr. De Niro's
18 assistant, not mine.

19 Q. What did you understand the
20 scope of Ms. Robinson's job
21 responsibilities to be as Mr. De
22 Niro's assistant?

23 A. To act in the role of his
24 assistant.

25 Q. Ms. Chen, what did you